

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTERNATIONAL BROTHERHOOD)	
OF TEAMSTERS LOCAL UNION 731,)	
)	
Plaintiff,)	
)	Case No. 08-cv-3136
v.)	
)	Judge Coar
ARC DISPOSAL COMPANY, INC.,)	
)	Magistrate Judge Brown
Defendant.)	
)	
)	
)	
)	

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant, by their attorneys, move for an extension of time to answer or otherwise plead. In support of the Motion, Defendant states as follows:

1. On May 30, 2008, Plaintiff International Brotherhood of Teamsters Local Union No. 731 ("Plaintiff"), filed a Complaint against Defendant ARC Disposal Company, Inc. ("Defendant"), in Northern District of Illinois, Eastern Division, Case No. 08-cv-3136 (the "Complaint"). Plaintiff served the complaint on Defendant's registered service agent, CT Corporation, on June 6, 2008.
2. Defendant has recently retained Morgan, Lewis & Bockius, LLP as counsel in this matter, and counsel requires additional time to investigate the allegations contained in Plaintiff's Complaint.
3. The parties are currently engaged in productive settlement negotiations.

4. Accordingly, Defendants request an additional 20 days from June 26, 2008, or until July 16, 2008, to answer or otherwise plead in response to Plaintiff's Complaint.

5. Plaintiff's counsel has been contacted and has no objection to the 20-day extension on behalf of the Defendants.

6. A 20 day extension of time will not cause excessive delay in the litigation and will not unduly prejudice any party.

WHEREFORE, Defendant respectfully requests the Court grant their Unopposed Motion for an Extension of Time To Answer or Otherwise Plead.

Dated: June 24, 2008

Respectfully submitted,

ARC Disposal Company, Inc.

By: s/ Ross Friedman
One of Its Attorneys

Sari Alamuddin
Ross Friedman
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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2008, I electronically filed the foregoing Notice of Motion and Unopposed Motion for an Extension of Time To Answer or Otherwise Plead and Proposed Order with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Robert E. Bloch
Steven W. Jados
DOWD, BLOCH & BENNETT
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Chicago, IL 60603
(312) 372-1361

By: s/ Ross Friedman